

REQUIRED STATEMENT  
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY

All Cases: Debtor(s) DARRIN D. RAINES, Case No. 15-02951 Chapter 13  
All Cases: Moving Creditor MTGLO Investors, LP Date Case Filed 01/29/2015

Nature of Relief Sought:  Lift Stay  Annul Stay  Other (describe)

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed 1/29/15

Chapter 7:  No-Asset Report Filed on  
 No-Asset Report not Filed, Date of Creditors Meeting

1. Collateral  
a.  Home  
b.  Car Year, Make and Model \_\_\_\_\_  
c.  Other (describe) \_\_\_\_\_

2. Balance Owed as of Petition Date \$ 177,386.96 per Claim 8-2  
Total of all other Liens against Collateral \$ 0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in all cases) \$ 240,993.00 per Debtor's Schedule A

5. Default  
a.  Pre-Petition Default  
Number of months 34 Amount \$ 32,723.64  
b.  Post-Petition Default  
i.  On direct payments to the moving creditor  
Number of months 6 Amount \$ 8730.00 (with \$1162.39 being held in suspense)  
ii.  On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

6. Other Allegations  
a.  Lack of Adequate Protection § 362 (d)(1)  
i.  No insurance  
ii.  Taxes unpaid Amount \$  
iii.  Rapidly depreciating asset  
iv.  Other (describe) \_\_\_\_\_  
b.  No Equity and not Necessary for an Effective Reorganization § 362(d)(2)  
c.  Other "Cause" § 362 (d)(1)  
i.  Bad Faith  
ii.  Multiple filings  
iii.  Other (describe)  
d. Debtor's Statement of Intention regarding the Collateral  
i.  Reaffirm ii.  Redeem iii.  Surrender iv.  No Statement of Intention filed

Date: 04/22/2020

/s/ Timothy R. Yueill

Submitted By